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October 9, 2002

Ms. Kristy Chew
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California Energy Commission
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Sacramento, CA 95814

RE: Preliminary Staff Assessment Comments, Set 3 (Revised)
Cosumnes Power Plant (01-AFC-19)

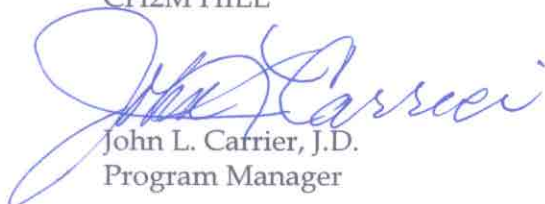
On behalf of the Sacramento Municipal Utility District, please find attached 12 copies and one original of PSA Comments, Set 3 (Revised), in response to staff's Preliminary Staff Assessment dated August 2002, and the PSA Supplement dated September 11, 2002.

This set of comments replaces the Set 3 comments filed on October 7, 2002 in their entirety. We are replacing the prior set of comments because the draft that was filed did not contain all of our comments. I hope this does not cause any confusion on the part of your staff.

Please call me if you have any questions.

Sincerely,

CH2M HILL



John L. Carrier, J.D.
Program Manager

c: Colin Taylor/SMUD
Kevin Hudson/SMUD
Steve Cohn/SMUD

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Listed below, for CEC staff's consideration, is Set 3 (Revised) of SMUD'S comments on the Preliminary Staff Assessment (PSA) for the Cosumnes Power Plant (CPP) project (01-AFC-19). The filing replaces, in its entirety, the prior version of Set 3 comments filed on October 7, 2002.

VISUAL RESOURCES

p. 4.11-3, Professional Standards: These "standards" come from one source and are not adopted by a standard setting entity nor have they been adopted by the CEC as the threshold of significance under CEQA. This discussion should be deleted.

p. 4.11-8, Compressor Station in Yolo County near Winters: To clarify, the compressor station will be located within an *existing fenced enclosure*.

p. 4.11-8, Compressor Station at Carson Ice Generation Plant: To clarify, the compressor station will be located within an *existing fenced enclosure*.

p. 4.11-11, Viewer Exposure, para. 2: The paragraph mistakenly indicates 3,800 vehicles travel along Clay East Road each day. AFC Table 8.10-3 indicates 3,800 vehicles travel along Twin Cities Road (SR 104), measured at the intersection of Clay East Road. According to SMUD's data response submittal 1M, traffic along Clay East Road averaged about 790 vehicles per day during the week data was collected.

p. 4.11-12, Viewer Concern: SMUD believes that eastbound travelers on Clay East Road west of Kirkwood Street do not have a view of the project site, so adding project features would not obscure their view. Therefore, the level of viewer concern relative to the project site should be low.

Also, SMUD questions whether visitors traveling to any location along Clay East Road or Kirkwood Street would have a moderate-to-high viewer concern. If they are visiting residents located on either of those roadways, their duration of view would be low (as indicated in Appendix VR-1), and, as visitors, they could be expected to experience the view of the project site relatively infrequently.

SMUD believes that overall motorist viewer exposure should be considered low rather than low to moderate since site visibility is low to nonexistent on Clay East Road west of Kirkwood Street. Motorists' views are only moderate or higher when they are driving for pleasure; but the evidence suggests that there are very few motorists driving eastbound on Clay East Road for scenic or pleasure purposes. When combined with low to moderate visibility for motorists (from Appendix VR-1), it is reasonable for overall visual sensitivity for motorists to be considered low. The conclusion that overall visual sensitivity for motorists is moderate (from Appendix VR-1) is inconsistent with the findings in Appendix VR-1 indicating a low to moderate visibility, low view duration, and low to moderate overall viewer exposure. At a minimum, the overall impact to motorists should be changed to low to moderate.

p. 4.11-13, para. 2: The paragraph mistakenly indicates 3,800 vehicles travel along Clay East Road each day. AFC Table 8.10-3 indicates 3,800 vehicles travel along Twin Cities Road (SR 104), measured at the intersection of Clay East Road. According to SMUD's data response submittal 1M, traffic along Clay East Road averaged about 790 vehicles per day during the week

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data was collected, of which about half are traveling eastbound. Therefore, the number of vehicles is lower than the 1,900 indicated in the PSA.

p. 4.11-17, View Blockage: In looking at Figures 3A and 3B, it is not apparent that the Sierra foothills are visible, so SMUD disagrees that views of them would be partially blocked due to project features. Also, it appears in Figure 3B that a relatively small portion of the sky would be blocked by project features. When considered in context of the entire amount of sky that is visible in the photo and the amount that would be blocked, it seems that view blockage should be considered low.

p. 4.11-17, Visual Impact Significance: Mitigation/conditions should not be imposed if the impact is "adverse but not significant." CEQA does not require mitigation for impacts that are below the level of significance.

pp. 4.11-18 and -19, Visual Impact Significance: Mitigation/conditions should not be imposed if the impact is "adverse but not significant." CEQA does not require mitigation for impacts that are below the level of significance.

p. 4.11-19, Visual Contrast, sent. 1: It does not appear that the electrical transmission facilities are visible in Figure 5B, so these features should not be considered "noticeable."

p. 4.11-19, Visual Contrast, last sentence: Although the project features would appear dissimilar to the surrounding landscape, as shown in Figure 5B, the degree of modification to the landscape when considered in context of the entire photograph, should be low instead of low-to-moderate.

p. 4.11-20, Visual Impact Significance: Mitigation/conditions should not be imposed if the impact is "adverse but not significant." CEQA does not require mitigation for impacts that are below the level of significance.

p. 4.11-21, Visual Impact Significance: Mitigation/conditions should not be imposed if the impact is "adverse but not significant." CEQA does not require mitigation for impacts that are below the level of significance.

p. 4.11-23, Consideration of Impacts in Relation to CEQA Significance Criteria: There are no impacts that require mitigation under Criterion 3 because, based on the analysis, a high level of visual degradation and a significant visual impact would not result.

p. 4.11-24, para. 4, sent. 1: SMUD questions the validity of this conclusion. These projects should not be considered to result in a significant cumulative visual impact when the number of receptors (residential viewers) is low, motorists have only a fleeting view from Twin Cities Road and a short view from Clay East Road, and one of the projects (RSP) has been part of the existing landscape for 30 years, well before many of the residences with views of that project and the project site moved into the area.

p. 4.11-24, para. 4, sent. 2: RSP has been at that site for nearly 30 years and, under CEQA, is considered an existing condition as part of the baseline for analysis.

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p. 4.11-24, para. 4, sent. 3: “The introduction of the Rancho Seco Power Plant introduced a substantial industrial element to the rural setting.” SMUD concurs with this statement. It should also be noted that landscaping does not exist around the perimeter of that project to screen that project's features. The absence of such screening does not detract from the views of that site.

p. 4.11-24, para. 4, sent. 4: The addition of project structures at the project site would be completely in character because of the long-time presence of RSP.

p. 4.11-24, para. 4, sent. 5: With the exception of the view from KOP 1 (see Figures 4B, 5B, and 6B), project features do not dominate the views, and Appendix VR-1 confirms that the project is either subordinate or co-dominant at the four KOPs. When considered in context of the entire photo, it does not appear that project features would detract from views shown in either KOPs 2, 3, or 4.

p. 4.11-24, Environmental Justice: As discussed in the previous comments on the Cumulative Impact section, SMUD does not consider there to be a significant cumulative impact.

p. 4.11-26, Table 4, Sacramento County General Plan Public Facilities Element, “Objective” row, “Basis for Consistency” column: No significant visual impacts were identified in this assessment. Therefore, mitigation should not be required.

p. 4.11-26, Table 4, “Sacramento County General Plan Public Facilities Element, Policy PF-72” row, “Basis for Consistency” column: Since no significant visual impacts were identified in this assessment, mitigation should not be required.

p. 4.11-32, Table 4, Zoning Ordinance, Section 320-05: SMUD filed Supplement C, showing the landscape setback boundary adjacent to Clay East Road in Figure 1.1-3R2; therefore, CPP is consistent with Sacramento County Ordinance Section 320-05.

p. 4.11-33, Mitigation of Construction Impacts, sent. 2: It is not clear what is being required to “visually screen” the listed sites. SMUD agrees that it is reasonable to screen the staging, material, and equipment storage areas, for both visual and public safety reasons. However, it is neither feasible nor reasonable to require screening of the pipeline construction sites when construction activities would move along the pipeline at a rate of 100 to 500 feet per day, and would only be visible to residents for 1 to 7 days.

p. 4.11-33, Mitigation of Impacts of Proposed Structures, para. 1, sent. 1: As noted above, staff’s analysis indicated that visual impacts were not significant and, therefore, under CEQA are not required to be mitigated. Also, as stated above, SMUD disagrees that there are cumulative impacts. Therefore, no mitigation for these impacts should be required.

p. 4.11-34, Mitigation of Impacts of Proposed Structures, para. 1 and item 3: Staff’s own analysis of KOP 2 determined that the visual impacts would not be significant (see pp. 4.11-18 and –19). Therefore, item 3 does not seem appropriate, since the impact is not significant. In addition, a 5-year growth period is arbitrary and not realistic with the types of trees identified in our filings (see Informal Data Response, Set 2). SMUD recommends that the 5-year requirement be dropped.

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pp. 4.11-34 and –35, Mitigation of Impacts in Relation to CEQA Significance Criteria, para. 1, first sentence: SMUD concurs with this statement. Under CEQA mitigation is not required for impacts that are not significant (see Section 15126.4 of the CEQA Guidelines).

p. 4.11-35, Mitigation of Cumulative Impacts: SMUD disagrees that CPP “will contribute substantially to significant visual impacts.” See comment above to: p. 4.11-24, para. 4, sent. 1.

pp. 4.11-36 to –39, Proposed Conditions of Certification: See comments above on pages 4.11-33 through –35.

p.4.11-36, VIS-2: Although SMUD does not feel it is necessary to impose this condition due to the less than significant impacts, SMUD would propose rewording a portion of the first sentence from “their surfaces do not create glare,” to “their surfaces do not create excessive glare.”

p. 4.11-37, VIS-3: Although SMUD does not feel it is necessary to impose this condition due to the less than significant impacts, a 5-year growth period is arbitrary and not realistic with the types of trees identified in our filings (see Informal Data Response, Set 2). SMUD recommends that the 5-year requirement be dropped. In addition, since the trailer at KOP 1 is being relocated, any visual simulations should be shown from KOPs 2 and 3.

p. 4.11-37, VIS-4: SMUD requests any lighting condition of certification be coordinated with the CEC biology and traffic & transportation staff, and consolidated in the visual section to avoid conflicting conditions.

WATER AND SOIL RESOURCES

p. 4.13-1 to -5, LORS: The selection of LORS, and the sections quoted in this PSA are largely at variance with previous PSAs. It is not clear why staff has selected LORS, many of which were not cited in previous PSAs, or which may have been determined to be inappropriate in previous PSAs to apply to the SMUD case. SMUD finds it highly unusual that this PSA is unique in citing many of these LORS (see the table below). This suggests that CEC staff is not applying an objective standard to this project, consistent with previous projects. In legal terms, an agency that applies different standards to different projects has an onus to demonstrate why a different set of standards and applicable regulations should apply. SMUD requests CEC staff explain why this project has a unique set of LORS.

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LORS Identified as Applicable to CPP	LORS Identified as Being Applicable to Other Power Projects.				
	Metcalf Energy Center	Sutter Energy Center	Delta Energy Center	Woodland Generation Station	San Joaquin Valley Energy Center
CWA 33 1251, CWA 401, 404	Yes	Yes	Yes	Yes	Yes
CWA 402	No	No	No	No	No
Reclamation Projects Reauthorization Act of 1992	No	No	No	No	No
California Constitution, Article X, Section 2	No	No	No	No	No
Porter Cologne Section 13000	Yes	Yes	Yes	Yes	Yes
Water Code 13552.6	No	No	No	No	Yes
Water Code 13552.8	No	No	No	No	Yes
Water Recycling Act of 1991 (Water Code 13575)	No	No	No	No	No
CDFG 1601, 1603	Yes	Yes	Yes	Yes	Yes
DHS Title 22	No	No	No	No	No
SWRCB 75-58	Yes	Yes	Yes	Yes	Yes
SWRCB 77-1	No	No	No	No	No
SWRCB 68-16	No	No	No	No	No

p. 4.13-2, State: Section 13552.6 and 13552.8 address the use of potable domestic water for cooling towers. SMUD is not proposing to use potable domestic water in the cooling towers; rather, it is proposing to use untreated water from the Folsom-South Canal. Please delete this reference to potable domestic water.

p. 4.13.2, State: The water recycling act does not apply to SMUD's proposal. Please delete this reference.

p. 4.13-3, para. 11: SMUD agrees with the statement that reclaimed water wholesalers should share in the cost associated with development and use of reclaimed water.

p. 4.13-4, State: SMUD does not intend to recycle water, as the Water recycling criteria applies to treatment works at a wastewater treatment plant. This criteria should be deleted for phase I.

p. 4.13-4, State Policies: Resolution 75-58 regards new water rights and disposal of waste water. Because SMUD has an existing water supply and is proposing to use a ZLD system, this policy does not apply to the SMUD project. Please delete reference to this policy.

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p. 4.13-4, State Policies: Resolution 77-1 is inapplicable to the SMUD project and should be deleted.

p. 4.13-4, State Policies: Resolution 68-16 refers to waste disposal and is not applicable to the SMUD project. Please delete reference to this policy.

p. 4.13-7, Folsom South Canal, s. 6: The use of the word “allocated” is incorrect. Please delete “allocated to be” and insert “presently.”

p.4.13-7, Folsom South Canal, s.7: As currently written, this scenario is not feasible with ZLD. SMUD proposes deleting the sentence and replacing with, “SMUD’s staff has indicated that the increase in use of additional FSC water above 15,000 AFY for the CPP may decrease as RSP decommissioning and flushing flows need diminish. However, any potential reduction would be subject to environmental review.”

p.4.13-7, Folsom South Canal, last sentence: The quantity of water temporarily assigned to Arden Cordova Water District should be “up to 10,000” instead of “5,000.”

p. 4.13-8, para. 1: “and to maintain riparian vegetation downstream of the dam.” SMUD does not believe this is an accurate characterization and should be deleted.

p. 4.13-8, para. 1: Revise next to last sentence and add a sentence to read: “SMUD agreed to operate Rancho Seco Reservoir as a public park for 50 years. This obligation continues through December 31, 2022.” The implication that SMUD will operate Rancho Seco as a public park for 50 years from 1992 is incorrect.

p. 4.13-8, Clay Creek, Hadselville Creek, and Laguna Creek, para 2: “Clay Creek...has been diverted...as a result of construction of the RSP”. SMUD does not believe Clay Creek was diverted by construction of the RSP. Please share reference for this statement.

p. 4.13-9, Cooling Water Source: “Water quality is known to change significantly during canal passage...” SMUD does not understand how changes in the canal are relevant to an evaluation of project impacts. Suggest deleting this and Table 1.

p. 4.13-9, Folsom South Canal/Rancho Seco Reservoir, para. 2: “...when there is sufficient groundwater inflow.” SMUD does not understand the relevance of this, and would appreciate being directed to the source of this information.

p. 4.13-9, Folsom South Canal/Rancho Seco Reservoir, para. 2: “. . . water quality degrades as the distance from the American River increases.” As noted above, it is not clear how this is relevant. SMUD suggest deleting the statement or explaining what is meant by water quality degradation. Perhaps the CEC means that TDS increases?

p. 4.13-10, East Bay Municipal Utility District, s. 3: The parties are misstated. Please replace “City of Sacramento” with “Sacramento County.”

p. 4.13-10, East Bay Municipal Utility District, last sentence: “If approved and built, this diverted Sacramento water quality...would degrade...” As noted above, is “degrade” synonymous with an increase in TDS?

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p.4.13-11, CPP Site Erosion and Sedimentation, para. 2: “The west tributary would be allowed to flow into the proposed switchyard area (SMUD 2002 aa).” SMUD does not intend to allow the tributary to flow through the switchyard as shown on Figure 3, Grading and Drainage Plan previously submitted to CEC staff. SMUD also notes there is no reference called SMUD 2002aa in this section, please add it.

p. 4.13-11, bullet 4: “the formation of two new stream channels in areas that could be unstable when subject to concentrated flow” SMUD does not know to what CEC staff is referring. The two constructed channels that are proposed would be equivalent widths to those that would be re-aligned for construction. Please provide additional explanation.

p. 4.13-12, CPP Linear Facilities Erosion and Sedimentation, para. 2: “...ten of the crossings...” SMUD intends to cross four waterways using HDD. Most roads and railroads are crossed using “jack and bore” technology. The statement should be corrected.

p. 4.13-13, para. 1: “permanent BMPs would be implemented at laydown areas and along linear routes...” SMUD is not familiar with the term “permanent BMPs.” Is this the same as restoration as referred to in the biological and soils sections?

p. 4.13-14, CPP Site Stormwater Control, para. 1: “15 percent of the CPP would be located in an area that is now subject to 100-year flooding by Clay Creek.” SMUD believes this estimate is quite high and would appreciate CEC staff sharing how they calculated this number.

p. 4.13-14, Diversion of Tributaries, para. 1: “intercepting the flow at the south property line and conveying this flow directly east...” SMUD intends to divert this flow upstream of the laydown area for a smooth transition in flow direction as shown in grading and drainage plans provided previously to CEC staff.

p. 4.13-15, para. 2 following Table 3, “Will flow down its current course through the proposed Switchyard (SMUD 2002z)” As noted above, SMUD does not propose to allow flows through the switchyard. SMUD 2002z does not refer to Data Response Set 2. Please clarify.

4.13-16, Project Water Supply, s. 6: The sentence should read, “SMUD currently uses approximately 15,000 AFY from the FSC at the Rancho Seco Site.” As stated in the PSA, this is not SMUD’s position. With ZLD the 15,000 AFY may or may not change.

4.13-17, para. 1: The last sentence indicates that staff has not received SMUD’s proposal at this writing. SMUD has committed in writing to further study alternatives, with an option ready prior to groundbreaking on Phase 2 of CPP.

p.4.13-18; Table 5: SMUD is not aware that there is an MCL for Total Organic Carbon, nor is it clear why this measurement is “N/A” for reclaimed water. Please clarify.

p. 4.13-18; Table 5: SMUD believes the MCL for total inorganic mercury is 2 µg/L. Please check Table 5 for accuracy.

p 4.13-18, Alternative Water Supplies, para. 1, last sentence: This sentences states: “SMUD...is planning to make a proposal for the Phase 2 portion of the CPP project that would include the use of reclaimed water (SMUD 2002ad).” This sentence mischaracterizes Supplement C

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Executive Summary referenced in the PSA. The Executive Summary states, “SMUD has also charted a course for incorporating a source of reclaimed water, or otherwise mitigating the use of fresh water to potentially supplement the second phase of CPP...SMUD recognizes the importance of this issue, and is prepared to commit to further study of these options, with an option ready prior to groundbreaking on Phase 2.” The discussion regarding alternative water supplies in the PSA should be revised to accurately reflect SMUD’s commitment regarding the future involvement of reclaimed water. In addition, the reference to the Executive Summary of Supplement C should be “SMUD 2002 ac”, not “SMUD 2002 ad.” Since Supplement C replaced the draft Executive Summary, Supplement C should be referenced. Please note that in the Reference section both the Executive Summary and the complete Supplement C are referenced as “SMUD 2002ac.” The latter reference should be changed to “SMUD 2002ad.”

p. 4.13-19, Recycled Water Supply Options, para. 3: “which is now available at all 3 of the municipal wastewater sources...” This is inconsistent with information provided to SMUD by these utilities. Please provide the source of information and in all cases indicate whether the source is currently available, expected to become available, or whether available capacity is already obligated.

p. 4.13-20, Reclaimed Stormwater, 3: “The applicant could capture and reuse collected stormwater as a part of the ZLD proposal. This requires a very low investment and would directly save about one-half percent of the annual water demand...” SMUD does not agree that stormwater capture into the cooling system is feasible without greatly increasing available storage and treatment. SMUD is not aware of any power plants operating that do what is suggested here. SMUD requests CEC staff provide the evidence on which this conclusion is based, as it is not consistent with SMUD’s analysis.

p. 4.13-20, Alternative Cooling Processes: Regarding the statement: “Several alternate cooling technologies are being increasingly used and are feasible and well proven....Staff has identified hybrid and dry cooling as the most viable alternative technologies to the proposed wet cooling towers for this site.” SMUD agrees with the USEPA findings in its study of alternative cooling technologies within the context of evaluating the significant and adverse environmental impacts within **all** disciplines. Section C [p. 65282 – 65284] is entitled “*Why EPA Is Not Adopting Dry Cooling as the Best Technology Available for Minimizing Adverse Environmental Impact?*” SMUD agrees with the USEPA determination that the technology of dry cooling carries costs that are sufficient to pose a barrier to entry to the marketplace for some projected new facilities. In addition, SMUD’s studies are consistent with USEPA’s findings that dry cooling technology also has some detrimental effect on electricity production by reducing energy efficiency of steam turbines.

Regarding hybrid cooling, SMUD agrees with the USEPA findings that hybrid cooling systems have not been adequately demonstrated for power plants of the size projected to be within the scope of their ruling.

SMUD agrees with the USEPA that reliability and efficiency are critical elements that are parallel to the objectives of the CPP project. SMUD offers that as a public utility, SMUD cannot

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put at risk the support of the public trust to inefficient and unproven technologies in the long-term.

p. 4.13-23, Regional Water Supply, para. 2, last sentence: SMUD proposes deleting the last sentence and replacing it with, "In AFC Supplement C, SMUD committed to further study alternatives to minimize use of freshwater for cooling, with an option to be ready prior to groundbreaking on Phase 2 of CPP."

p. 4.13-23, Flooding: "Flood discharges typically increase with industrialization and new construction. The proposed CPP project would contribute incrementally to this increase on the Cosumnes River watershed. Although staff needs additional information..." SMUD contends that in the disperse rural conditions in southeast Sacramento County the conversion of 40 acres of land to partly permeable conditions is inconsequential and does not require further study to conclude that project-related flooding impact would not be significant.

p. 4.13-23, Compliance with LORS: This discussion refers to SWRCB policy 75-58 and the State Recycling Act. Neither of these apply to the SMUD project and should be deleted.

4.13-26, Proposed Mitigation, No. 3: SMUD proposes deleting the sentence and replacing with, "SMUD's staff has indicated that the increase in use of additional FSC water above 15,000 AFY for the CPP may decrease as RSP decommissioning and flushing flows needs diminish. However, any potential reduction would be subject to environmental review."

4.13-26, Conclusions and Recommendations, para. 2: SMUD proposes replacing paragraph 2 with the following, "The applicant has committed to further study alternatives that minimize use of freshwater for cooling for Phase 2 of the CPP. The applicant anticipates completing necessary studies and preparing an option prior to groundbreaking on Phase 2."

p. 4.13-26, SOIL&WATER-1: SMUD plans to extend the general permit for stormwater discharge associated with operation as well as construction.

p. 4.13-27: SOIL&WATER-2 and SOIL&WATER-4: SMUD believes the Erosion Control and Revegetation Plan should be required prior to any vegetation removal, grading, trenching or earth moving activities. Mobilization activities that do not require soil disturbance should not be contingent on this item.

p. 4.13-27, SOIL& WATER-4, Verification: Please add after the phrase, "404 permits" the phrase "for that element" to clarify the verification.

4.13-28, SOIL&WATER 6: SMUD proposes keeping the first sentence, then deleting the sentences that follow.

4.13-28, SOIL&WATER 6, Verification: SMUD proposes deleting everything after the phrase "quantifying the amount of water used."

VISIBLE PLUMES

p. 4.15-2, Evaluation Process: Please note that Figure 3 is not an "existing condition" photo, because it had the project simulated into the photograph.

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p. 4.15-6, A discussion of KOP 1 is missing. Is this because the trailer is being relocated?

p. 4.15-6, KOP 2 – Clay East Road: In the Visual Resources discussion, KOP 2 is referred to as “Kirkwood Street” not “Clay East Road.”

p. 4.15-7, KOP 3 – Clay Station Road, para. 1: Figure 3 does not appear to be an existing condition photo, and does not appear to be as elevated a view as is shown in Visual Resources Figure 5A. Please confirm that this is the location of KOP 3 from the AFC.

p. 4.15-10, Visual Impacts from Nearby Viewing Locations: Again, there is no discussion of KOP 1.

p. 4.15-16, Proposed Conditions of Certification, PLUME-1 and PLUME-2: SMUD feels it is worthy to ensure a cooling tower meets project specifications, and it will require performance testing as it affects overall plant performance and efficiency; however, SMUD requests these special and unusual conditions be deleted. SMUD is prepared to seek input from vendors regarding these conditions and will agree to furnish this information to the CEC. The Applicant is concerned that the proposed conditions are experimental, have no precedent in power plant licensing, and will restrict SMUD’s competitive public bid process. SMUD is also concerned that proposed monitoring may be technically infeasible and without basis for comparison to other quantifiable measures. Certain monitoring technical requirements in PLUME-2 may be impossible to accurately achieve (e.g., hourly measurement of inlet airflow rates). In addition, without reference to CTI or ASTM standardized tests or other protocol, measurement practices and placement of instruments are subject to a wide range of interpretation, with varying results. Since PLUME-1 is dependent upon the technical feasibility of PLUME-2, both should be deleted.

VISIBLE PLUMES APPENDIX

No comments.

ALTERNATIVES

p. 6.1-3, Air Quality: The section lists four major air quality issues that could affect licensing of the project. Related to these listed issues, SMUD provided detailed comments on air quality in its PSA Comments, Set 1 (dated September 6, 2002). SMUD has not altered its air quality comments from those submitted on September 6, 2002.

APPENDIX A TO WATER AND SOIL RESOURCES

No comments.